

foot-by-28-foot commemorative mural that was displayed at the summit as a welcome to NATO leaders.

Students at Benjamin Franklin were assigned to create a painting honoring our northern neighbor Canada. Their inspiring design shows three individuals draped in the flags of the United States, France, and Britain—the three nations with which Canada has its closest ties—against the Canadian flag. It is a strong symbol of international unity that highlights the enduring relationship of the nations depicted. The students, their teachers, and Principal Tony Bencivenga did an outstanding job.

I ask my colleagues in the House of Representatives to join me in congratulating these young people not only for creating an outstanding piece of art but for seeing the importance of international harmony and becoming active participants in our global society. From culture to economy, no nation is "an island" today. Young people who understand that are better prepared to be the leaders of tomorrow and to be dedicated to expanding democracy, peace, and prosperity in our world.

**A BILL TO REPEAL THE LIMITATION ON THE USE OF FOREIGN TAX CREDITS UNDER THE ALTERNATIVE MINIMUM TAX**

**HON. AMO HOUGHTON**

OF NEW YORK

IN THE HOUSE OF REPRESENTATIVES

*Thursday, April 29, 1999*

Mr. HOUGHTON. Mr. Speaker, I am pleased to join my colleague from New York, Mr. RANGEL, together with a number of other colleagues, in introducing our bill that would eliminate a fundamental unfairness in the application of the U.S. tax law to taxpayers that have income from foreign sources.

A U.S. citizen or domestic corporation that earns income from sources outside the United States generally is subject to tax by a foreign government on that income. The taxpayer also is subject to U.S. tax on that same income, even though it is earned outside the United States. Thus, the same income is subject to tax both in the country in which it is earned and in the United States. However, the United States allows taxpayers to treat the foreign taxes paid on their foreign-source income as an offset against the U.S. tax with respect to that same income. This offset is accomplished through the foreign tax credit; the foreign tax paid on foreign-source income is treated as a credit against the U.S. tax that otherwise would be payable on that same income. Although the details of the foreign tax credit rules are extraordinarily complex (as are the international provisions of the Internal Revenue Code generally), the basic principle is simple: to provide relief from double taxation.

When it comes to the alternative minimum tax (AMT), this basic principle of providing relief from double taxation falls by the wayside. The AMT was enacted to ensure that individuals and businesses that qualify for various "preferences" in the tax rules nevertheless are subject to a minimum level of taxation. However, the foreign tax credit provisions of the

AMT operate to ensure double taxation. Under these AMT rules, the allowable foreign tax credit is limited to 90 percent of the taxpayer's alternative minimum tax liability. Because of this limitation, income that is subject to foreign tax is subject also to the U.S. AMT. The result is double (and even triple) taxation of income that is used to support U.S. jobs, R&D and other activities.

There is no rational basis for denying relief from double taxation to that class of taxpayers that are subject to the AMT. Accordingly, the bill we are introducing today will eliminate the 90 percent limitation on foreign tax credits for AMT purposes. With the elimination of this limitation, relief from double taxation will be provided to taxpayers that are subject to the AMT in the same manner as it is provided to those taxpayers that are subject to the regular tax.

Concern regarding the unfairness of the AMT limitation on the use of the foreign tax credits is not new. Indeed, the House in 1995 passed a provision repealing the 90 percent limitation as part of a complete package of AMT reforms. Overall reform of the AMT, for individuals and businesses, remains an important piece of unfinished business. This bill to eliminate the 90 percent limitation on foreign tax credits for AMT purposes represents an important step in that direction and we urge our colleagues to join us in cosponsoring this legislation.

**INTRODUCTION OF THE BROWNFIELDS CLEAN-UP ACT**

**HON. WILLIAM J. COYNE**

OF PENNSYLVANIA

IN THE HOUSE OF REPRESENTATIVES

*Thursday, April 29, 1999*

Mr. COYNE. Mr. Speaker, today I am introducing legislation which would make the existing tax incentive for cleaning up brownfields permanent.

Brownfields are vacant industrial or commercial sites. There are more than 400,000 such sites across the country. Brownfields cause economic blight by crowding out new businesses, preventing the creation of new jobs, and reducing municipal property tax revenues. They reduce the value of surrounding property and they can be public health problems.

Brownfields sites often require environmental remediation before they can be redeveloped and returned to productive use. At the very least, the prospect of significant remediation costs often discourages the redevelopment of such sites.

The 1997 Taxpayer Relief Act established a provision for expensing brownfield clean-up costs in certain targeted areas—empowerment zones, enterprise communities, EPA brownfields pilot project sites, and census tracts with high poverty rates. This provision can be an important tool for encouraging the clean-up and redevelopment of unproductive brownfield sites.

Unfortunately, however, the existing provision only allows expensing for expenditures or costs incurred between August 6, 1997, and December 31, 2000. That is too short a period of time for many potential users to take advan-

tage of it. Consequently, I believe that this provision should be made permanent. The Administration shares that view and proposed making the provision permanent in the budget request that it submitted to Congress in February.

Today Congressman RANGEL and I are introducing legislation that would make the brownfields expensing provision permanent. Enactment of this legislation would provide much-needed help to many of the economically distressed communities across the country that are currently burdened with one or more brownfields sites. I urge my colleagues to cosponsor this important legislation.

**DECLARING STATE OF WAR BETWEEN UNITED STATES AND GOVERNMENT OF FEDERAL REPUBLIC OF YUGOSLAVIA**

SPEECH OF

**HON. DENNIS J. KUCINICH**

OF OHIO

IN THE HOUSE OF REPRESENTATIVES

*Wednesday, April 28, 1999*

Mr. KUCINICH. Mr. Speaker, the truth is war is being waged and will continue to be waged without declaration. But such violence is neither redemptive nor justified in law or morality. Hope is redemptive, love is redemptive, peace is redemptive, but the violence of this conflict stirs our most primitive instincts. When we respond to such instincts, we enact the law of an eye for an eye, and we at last become blind and spend our remaining days groping to regain that light we had once enjoyed.

He only understands force, it is said of Mr. Milosevic, but we must understand more than force. Otherwise, war is inescapable. We must make peace as inexorable as the instinct to breathe, as inevitable as the sunrise, as predictable as the next day. With this vote, let us release ourselves from the logic of war and energize a consciousness of peace, peace through implied strength, peace through express diplomacy, peace through a belief that through nonviolent human interaction, we can still control our destiny.

**A TRIBUTE TO DR. YVONNE SCARLETT-GOLDEN, DOCTORATE OF LAWS, BETHUNE-COOKMAN COLLEGE**

**HON. CARRIE P. MEEK**

OF FLORIDA

IN THE HOUSE OF REPRESENTATIVES

*Thursday, April 29, 1999*

Mrs. MEEK of Florida. Mr. Speaker, I rise today in tribute to the honorable Dr. Yvonne Scarlett-Golden, my dear friend, whose title of honorary Doctorate of Laws was conferred by Bethune-Cookman College on April 26, 1999. This honor is very highly deserved. I have had the honor and the immense pleasure of knowing and working with Yvonne for many years, and her name is synonymous with dedication and commitment towards the public good.

She is a master teacher, a superlative retired school principal, an effective city council